

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
(AT CLEVELAND)

ADELA BAI, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

TCP INTERNATIONAL HOLDINGS LTD.,  
KAREL ROBERT DEN DAAS, ELLIS YAN,  
and BRIAN CATLETT,

Defendants.

Case No. 16-cv-102 (DCN) (NAV)

CLASS ACTION

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5(h) and the attached Affidavit and Certificate of Good Standing, Richard S. Wayne, moves this Court for admission *pro hac vice* of Adam M. Apton, Levi & Korsinsky, LLP, 1101 30<sup>th</sup> Street, N.W., Suite 115, Washington, DC 20007 to represent plaintiff, Adela Bai in this matter.

Dated: January 29, 2016

Respectfully submitted,

/s/ Richard S. Wayne

Richard S. Wayne (0022390)

Thomas P. Glass (0062382)

STRAUSS TROY

The Federal Reserve Building

150 East Fourth Street

Cincinnati, OH 45202-4018

(513) 621-2120 – Telephone

(513) 629-9426 – Facsimile

E-mail: rswayne@strausstroy.com

E-mail: tpglass@strausstroy.com

*Counsel for Plaintiff, Adela Bai*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been filed electronically with the U.S. District Court this 29<sup>th</sup> day of January, 2016. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. If a party is not given notice electronically through the Court's system a copy will be served by ordinary United States mail, first class postage prepaid, this 29<sup>th</sup> day of January, 2016.

/s/ Richard S. Wayne

Richard S. Wayne (0022390)

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